

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

INDICTMENT CR 14-364 RHK/FLN

(18 U.S.C. § 371)

(18 U.S.C. § 922(g)(1))

(18 U.S.C. § 922(a)(6))

1. VELTREZ BLACK,
a/k/a "Chief,"
2. TYWIN BENDER,
a/k/a "Finn Winn,"
3. NITELN JACKSON,
a/k/a "King Nite,"
4. DONTEVIUS CATCHINGS,
a/k/a "Lil Snake,"
5. CINQUE OWENS,
6. JABARI JOHNSON,
7. DARRYL PARKER,
a/k/a "Thirsty,"
8. MARQUIS WOODS,
a/k/a "Quis Moe,"
9. MARQUES ARMSTRONG,
a/k/a "Lil Kease,"
10. DEONTAY JONES, and
11. LAKESHA COLEMAN,

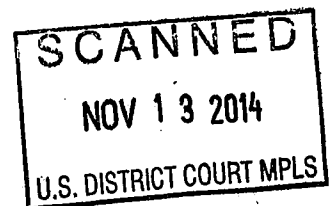
Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Conspiracy - Felon in Possession of Firearms)

From on or about at least January 1, 2010, through the present, in the State and
District of Minnesota and elsewhere, the defendants,



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VELTREZ BLACK,
a/k/a "Chief,"
TYWIN BENDER,
a/k/a "Finn Winn,"
NITELLEN JACKSON,
a/k/a "King Nite,"
DONTEVIUS CATCHINGS,
a/k/a "Lil Snake"
CINQUE OWENS,
JABARI JOHNSON,
DARRYL PARKER,
a/k/a "Thirsty,"
MARQUIS WOODS,
a/k/a "Quis Moe,"
MARQUES ARMSTRONG,
a/k/a "Lil Kease,"
DEONTAY JONES, and
LAKESHA COLEMAN,

knowingly and intentionally conspired with each other and with others to violate Title 18, United States Code, Section 922(g)(1), which makes it a federal crime to be a felon in possession of a firearm, all in violation of Title 18, United States Code, Section 371.

BACKGROUND AND PURPOSE OF THE CONSPIRACY

1. During the time-frame of the conspiracy, the defendants organized and maintained two closely associated street gangs known as the 1-9 gang (also known as the 1-9 Dipset and the 1-9 Vice Lords) and the Stick Up Boys gang, also known as SUB. The current leader of the 1-9 gang is Veltrez Black. The current leaders of the Stick Up Boys gang are Tywin Bender, Nitelen Jackson, and Dontevious Catchings. Defendants Jabari Johnson and Darryl Parker are prominent members of the 1-9 gang. Defendants Cinque Owens, Marquis Woods, and Marques Armstrong are prominent members of the

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Stick Up Boys gang. All of the aforesaid defendants are convicted felons, except Marques Armstrong. The two gangs coordinated their illegal activities.

2. The purpose of the gangs was to make money for the gang members through criminal acts including armed robberies, drug dealing, and thefts.

3. Another purpose of the gangs was to obtain, possess, and use firearms. The defendants obtained firearms in a variety of ways, including thefts, trading drugs for guns, and use of straw purchasers. The straw purchasers were associates who had no felony convictions and could lawfully purchase firearms. They purchased guns in their own names that were then transferred to members of the 1-9 and Stick Up Boys gangs, including the members who are felons. The straw purchasers sometimes falsely reported to the police that the guns they purchased had been stolen from them, in order to explain why the guns no longer were in their possession. In addition to the straw purchasers, members of the 1-9 and Stick Up Boys gangs who were not felons facilitated the illegal possession of firearms by those members who were convicted felons by providing locations to store the firearms and by otherwise holding guns for them.

4. During the period of the indictment, the 1-9 and Stick Up Boys gangs were in a gang war with two rival gangs known as the Taliban and the YNT, which stands for "Young 'N Thuggin'." This gang war resulted in the shooting deaths of numerous gang members on both sides of the conflict including 1-9 gang members Tyrone Washington, a/k/a "Ty Crack," Dacari Starr, a/k/a "Pudda Loc," Haywood Eaton, and Juwon Osborne, a/k/a "Skitz." Murder victims from the Taliban and YNT gangs included Derrick Martin, a/k/a "D-Nice," and Kyle Parker, a/k/a "K-Top." In addition to murders, several gunshot

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woundings resulted from this gang war including the wounding of at least five 1-9 or Stick Up Boys gang members, and at least four Taliban or YNT gang members.

5. Due to the ongoing gang war, and the need for weapons to conduct the other illegal activity described above, the members of the 1-9 and Stick Up Boys gangs, as well as their straw purchasers, conspired to illegally obtain and jointly possess firearms.

OVERT ACTS

During and in furtherance of the conspiracy, the defendants committed the following overt acts, among others:

6. Straw purchases by Deontay Jones. In the three-month period between July 28, 2013 and October 31, 2013, defendant Deontay Jones purchased four separate firearms. He subsequently made false police reports claiming that all four guns were stolen from him in two separate burglaries of his residence. However, at least two of the guns were provided to 1-9 gang members. On May 6, 2014, 1-9 gang member D.W., a convicted felon, was caught in possession of the Smith and Wesson .40 caliber semi-automatic pistol that Deontay Jones purchased on October 31, 2013. D.W. is Deontay Jones' cousin. On June 4, 2014, 1-9 gang member J.T., a convicted felon, was caught in possession of the Ruger 9 mm semi-automatic pistol that Deontay Jones purchased on September 11, 2013.

7. Straw purchases by Lakesha Coleman. During the three-month period between February 1, 2014 and April 18, 2014, defendant Lakesha Coleman purchased six separate firearms. At least one of those guns was provided to Stick Up Boys gang

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members. On October 8, 2014, an FMK 9 mm semi-automatic pistol that Lakesha Coleman purchased on April 18, 2014 was recovered by Minneapolis police after a shots-fired call at 3341 Oliver Avenue North, in Minneapolis, which is the residence of Stick Up Boys gang member Marques Armstrong.

8. During the period of the conspiracy, Marques Armstrong made his residence at 3341 Oliver Avenue North, Minneapolis, Minnesota available as a meeting place for other members of the 1-9 and Stick Up Boys gangs, and as a place for them to store their guns.

9. On January 2, 2013, Nitelen Jackson possessed a Glock .40 caliber semi-automatic handgun at his residence on Lyndale Ave. N. in Minneapolis.

10. On or about January 25, 2013, Tywin Bender, a/k/a "Finn Winn," used a firearm to commit an aggravated robbery against a person who was trying to sell an I-phone on Craigslist.

11. On or about January 31, 2013, Tywin Bender, a/k/a "Finn Winn" possessed a firearm during an arrest.

12. On or about December 12, 2013, Veltrez Black unlawfully possessed seven firearms at his residence as a convicted felon.

13. On or about April 28, 2014, Marques Armstrong unlawfully possessed a Sturm Ruger .22 caliber pistol and a Smith & Wesson .357 caliber revolver during a traffic stop.

14. On or about May 21, 2014, Dontevius Catchings and Marques Armstrong attempted to rob a third party at the third party's residence while armed with a gun. This

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incident resulted in the wounding of the intended robbery victim. In the following days, Marques Armstrong was arrested in possession of a stolen semi-automatic pistol with a 30-round magazine. Dontevius Catchings was arrested with the cell phone taken from the victim during the robbery attempt.

15. On or about September 20, 2014, Cinque Owens unlawfully possessed a Grendel .380 caliber semi-automatic pistol as a convicted felon.

16. On or about October 23, 2014, Marques Armstrong unlawfully carried a pistol in public without a permit.

COUNT 2

(Felon in Possession of a Firearm)

On or about April 22, 2014, in the State and District of Minnesota, the defendant,

VELTREZ BLACK,
a/k/a "Chief,"

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Court	Date of Conviction (on or about)
Aiding and Abetting an Offender to Avoid Arrest	Hennepin County, Minnesota	November 19, 2007
First Degree Aggravated Robbery	Hennepin County, Minnesota	May 27, 2008

knowingly possessed, in and affecting interstate commerce, a Smith & Wesson .40 caliber semi-automatic pistol, serial number DWA 2128, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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COUNT 3

(Felon in Possession of a Firearm)

On or about April 5, 2012, in the State and District of Minnesota, the defendant,

NITELEN JACKSON,
a/k/a "King Nite,"

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Court	Date of Conviction (on or about)
Theft of a Motor Vehicle	Hennepin County, Minnesota	April 6, 2010
Receiving Stolen Property	Hennepin County	October 14, 2010

knowingly possessed, in and affecting interstate commerce, a Glock .40 caliber semi-automatic pistol, serial number CVK525US, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Count 4

(Felon in Possession of a Firearm)

On or about May 21, 2014, in the State and District of Minnesota, the defendant,

DONTEVIUS CATCHINGS,
a/k/a "Lil Snake,"

having previously been convicted of the following crime, which was punishable by imprisonment for a term exceeding one year:

Offense	Court	Date of Conviction (on or about)
Felony Carrying a Pistol Without a Permit	Hennepin County, Minnesota	April 30, 2013

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knowingly possessed, in and affecting interstate commerce, a semi-automatic handgun, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Count 5

(Felon in Possession of a Firearm)

On or about June 3, 2014, in the State and District of Minnesota, the defendant,

JABARI JOHNSON,

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

Offense	Court	Date of Conviction (on or about)
Second Degree Possession of a Controlled Substance	Hennepin County, Minnesota	October 14, 2009
Fifth Degree Possession of a Controlled Substance	Hennepin County, Minnesota	October 14, 2009

knowingly possessed, in and affecting interstate commerce, a Smith and Wesson 9 mm semi-automatic pistol, serial number PDY0891, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 6

(Felon in Possession of a Firearm)

On or about November 12, 2012, in the State and District of Minnesota, the defendant,

DARRYL PARKER,
a/k/a "Thirsty,"

having previously been convicted of the following crime, which was punishable by imprisonment for a term exceeding one year:

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Offense	Court	Date of Conviction (on or about)
Third Degree Possession of a Controlled Substance	Hennepin County, Minnesota	January 5, 2010

knowingly possessed, in and affecting interstate commerce, a Thompson .45 caliber semi-automatic pistol, serial number E07648, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 7

(Felon in Possession of a Firearm)

On or about August 6, 2014, in the State and District of Minnesota, the defendant,

MARQUIS WOODS,
a/k/a "Quis Moe,"

having previously been convicted of the following crime, which was punishable by imprisonment for a term exceeding one year:

Offense	Court	Date of Conviction (on or about)
Fifth Degree Sale of Controlled Substance	Hennepin County, Minnesota	July 25, 2011

knowingly possessed, in and affecting interstate commerce, the following firearms: a Glock .40 caliber semi-automatic pistol, serial number MYR865, a Glock .40 caliber semi-automatic pistol, serial number MSP574; and a Bersa .380 caliber semi-automatic pistol, serial number B87637, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

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COUNT 8

(False Statement During Purchase of a Firearm)

On or about July 28, 2013, in the State and District of Minnesota, the defendant,

DEONTAY JONES,

in connection with the acquisition of a Ruger .380 caliber semi-automatic pistol, serial number 377-89555, from Bill's Gun Shop, a licensed dealer of firearms, knowingly made a false and fictitious written statement to Bill's Gun Shop, which statement was intended and likely to deceive Bill's Gun Shop as to a fact material to the lawfulness of the sale of the firearm to the defendant, in that the defendant represented that he was the actual buyer of the firearm, when in fact he was purchasing the firearm on behalf of another person; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 9

(False Statement During Purchase of a Firearm)

On or about September 11, 2013, in the State and District of Minnesota, the defendant,

DEONTAY JONES,

in connection with the acquisition of a Smith and Wesson 9 mm semi-automatic pistol, serial number HEW0498, and a Ruger 9 mm semi-automatic pistol, serial number 318-83055, from Mills Fleet Farm, a licensed dealer of firearms, knowingly made a false and fictitious written statement to Mills Fleet Farm, which statement was intended and likely to deceive Mills Fleet Farm as to a fact material to the lawfulness of the sale of the firearm to the defendant, in that the defendant represented that he was the actual buyer of

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the firearm, when in fact he was purchasing the firearm on behalf of another person; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 10

(False Statement During Purchase of a Firearm)

On or about October 31, 2013, in the State and District of Minnesota, the defendant,

DEONTAY JONES,

in connection with the acquisition of a Smith and Wesson .40 caliber semi-automatic pistol, serial number HEY2612, from Mills Fleet Farm, a licensed dealer of firearms, knowingly made a false and fictitious written statement to Mills Fleet Farm, which statement was intended and likely to deceive Mills Fleet Farm as to a fact material to the lawfulness of the sale of the firearm to the defendant, in that the defendant represented that he was the actual buyer of the firearm, when in fact he was purchasing the firearm on behalf of another person; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 11

(False Statement During Purchase of a Firearm)

On or about February 1, 2014, in the State and District of Minnesota, the defendant,

LAKESHA COLEMAN,

in connection with the acquisition of a Cobra .380 caliber semi-automatic pistol, serial number FS080307, from Guns of Liberty Trading, a licensed dealer of firearms, knowingly made a false and fictitious written statement to Guns of Liberty Trading,

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which statement was intended and likely to deceive Guns of Liberty Trading as to a fact material to the lawfulness of the sale of the firearm to the defendant, in that the defendant represented that she was the actual buyer of the firearm, when in fact she was purchasing the firearm on behalf of another person; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 12

(False Statement During Purchase of a Firearm)

On or about April 12, 2014, in the State and District of Minnesota, the defendant,

LAKESHA COLEMAN,

in connection with the acquisition of a Cobra .380 caliber semi-automatic pistol, serial number FS084057, and an SCCY 9 mm semi-automatic pistol, serial number 132710, from Guns of Liberty Trading, a licensed dealer of firearms, knowingly made a false and fictitious written statement to Guns of Liberty Trading, which statement was intended and likely to deceive Guns of Liberty Trading as to a fact material to the lawfulness of the sale of the firearm to the defendant, in that the defendant represented that she was the actual buyer of the firearm, when in fact she was purchasing the firearm on behalf of another person; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT 13

(False Statement During Purchase of a Firearm)

On or about April 18, 2014, in the State and District of Minnesota, the defendant,

LAKESHA COLEMAN,

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in connection with the acquisition of a Cobra .380 caliber semi-automatic pistol, serial number FS080932; a Cobra .380 semi-automatic pistol, serial number FS082705; and a FMK 9 mm semi-automatic pistol, serial number BP0691, from Guns of Liberty Trading, a licensed dealer of firearms, knowingly made a false and fictitious written statement to Guns of Liberty Trading, which statement was intended and likely to deceive Guns of Liberty Trading as to a fact material to the lawfulness of the sale of the firearm to the defendant, in that the defendant represented that he was the actual buyer of the firearm, when in fact he was purchasing the firearm on behalf of another person; all in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATIONS

If convicted of Counts 1 through 13 of this indictment, the defendants,

VELTREZ BLACK,
a/k/a "Chief,"
TYWIN BENDER,
a/k/a "Finn Winn,"
NITELLEN JACKSON,
a/k/a "King Nite,"
DONTEVIUS CATCHINGS,
a/k/a "Lil Snake"
CINQUE OWENS,
JABARI JOHNSON,
DARRYL PARKER,
a/k/a "Thirsty,"
MARQUIS WOODS,
a/k/a "Quis Moe,"
MARQUES ARMSTRONG,
a/k/a "Lil Kease,"
DEONTAY JONES, and
LAKESHA COLEMAN,

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shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), any firearm with accessories or any ammunition involved in or used in any knowing violation of sections 922(g)(1) or 922(a)(6), including the following firearms: a Smith & Wesson .40 caliber semi-automatic pistol, serial number DWA 2128; a Glock .40 caliber semi-automatic pistol, serial number CVK525US; a Grendel Model P10 .380 caliber semi-automatic pistol; a Smith & Wesson 9 mm semi-automatic pistol, serial number PDY0891; a Thompson .45 caliber semi-automatic pistol, serial number E07648; a Glock .40 caliber semi-automatic pistol, serial number MYR865; a Glock .40 caliber semi-automatic pistol, serial number MSP574; a Bersa .380 caliber semi-automatic pistol, serial number B87637; a Ruger .380 caliber semi-automatic pistol, serial number 377-89555; a Smith and Wesson 9mm semi-automatic pistol, serial number HEW0498; a Ruger 9 mm semi-automatic pistol, serial number 318-83055; a Smith and Wesson .40 caliber semi-automatic pistol, serial number HEY2612; a Cobra .380 caliber semi-automatic pistol, serial number FS080307; a Cobra .380 caliber semi-automatic pistol, serial number FS084057; an SCCY 9 mm semi-automatic pistol, serial number 132710; a Cobra .380 caliber semi-automatic pistol, serial number FS080932; a Cobra .380 semi-automatic pistol, serial number FS082705; and a FMK 9 mm semi-automatic pistol, serial number BP0691.

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON